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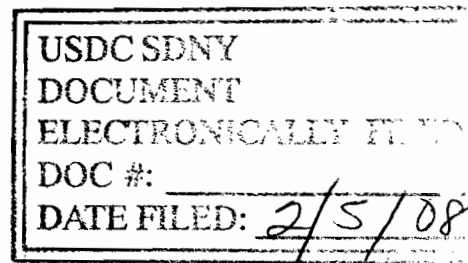
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February 5, 2008

Honorable Shira A. Scheindlin
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 735 1620
New York, NY 10007



RE: Global Logistics Group, Ltd. v. Yong He Shipping (HK) Ltd. et.al.
Case No. 07 CIV 10654

Dear Judge Scheindlin:

We represent the Plaintiff in the above Rule B maritime attachment proceeding and are writing in lieu of a formal motion to request permission to file a Second Amended Verified Complaint.

Plaintiff commenced this action against the defendants claiming \$830,409.89 in unpaid charter hire for the vessel "*AFEA*" under a charter party entered into between Plaintiff, as disponent owner, and defendant Yong He Shipping (HK) Ltd. ("Yong He") as charterer. The other defendants, Aegean Carriers S.A. ("Aegean"), South Aegean Shipping S.A. ("South Aegean"), and Prosper Shipping Limited ("Prosper"), were sued as alter egos of Yong He. Your Honor thereafter issued writs of maritime attachment against the defendants pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims.

The basis for this application to file a Second Amended Verified Complaint is that Plaintiff seeks to add an additional alter ego defendant, Global Oceanic Chartering Ltd. ("G.O. Chartering"). This court issued writs of attachment against the current alter ego defendants based upon evidence that they each made charter hire payments on behalf of Yong He and as such, a prima facie claim of alter ego status was established.

*Plaintiff is hereby permitted to file
a Second Amended Complaint by February
13, 2008
so ordered:
JMS 2/5/08*

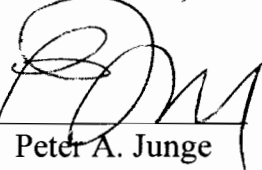
Similarly, G.O. Chartering, which ostensibly acted as a ship's broker for defendant South Aegean, requested that payment on its commission invoice dated 9/19/07 be made not to itself, but to South Aegean. *See Attached invoice from G.O. Chartering dated October 4, 2007.* Such a request was entirely inconsistent with G.O. Chartering's alleged status as South Aegean's broker. *See Wilhemsen Premier Marine Fuels AS v. UBS Provedores PTY LTD.*, 719 F. Supp.2d 399, 406-407 (2007) ("A broker has no obligation to pay on behalf of its principal in a broker's contract. Instead, the principal pays for the services obtained by the broker and the broker receives its commission.")

G.O. Chartering is a wholly owned subsidiary of Global Oceanic Carriers Limited, a public company under the Companies (Jersey) Law listed on the AIM of the London Stock Exchange. It is located at Bona Vista Building, 3 Xanthou St., 16674 Glyfada, Athens, Greece, at the same address as South Aegean. *See Attached 2007 Annual Report of Global Oceanic Carriers Limited.*

The intermingling of funds and a common office space and address can, *inter alia*, be considered when a plaintiff seeks to plead alter ego status. *SPL Shipping Ltd. v. Gujarat Cheminex Ltd.*, 2007 WL 831810 (S.D.N.Y.) It should further be noted that an article in Tradewinds Magazine dated October 19, 2007 reported that the board of directors of Global Oceanic Carriers Limited was investigating its chairman, Michael Tartsinis, for improperly transferring money from the public company to a private bank account and funneling these funds through G.O. Chartering. *See Article attached hereto.* It is submitted that given these facts, Plaintiff has established a prima facie case of G.O. Chartering's alter ego status with, at least, South Aegean, and as such, this court should endorse this application permitting Plaintiff to file a Second Amended Verified Complaint in the proposed form submitted herewith.

Respectfully,

JUNGE & MELE, LLP

By: 
Peter A. Junge